

Exhibit 3

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

AUTONOMOUS DEVICES LLC,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 22-1466-MN
)	
TESLA, INC.,)	
)	
Defendant.)	

**PLAINTIFF AUTONOMOUS DEVICES, LLC’S DISCLOSURES PURSUANT
TO PARAGRAPH 6(A) OF SCHEDULING ORDER**

Plaintiff Autonomous Devices, LLC, (“Autonomous”) hereby provides the following disclosures in accordance with Paragraph 6(a) of the Court’s scheduling order (D.I. 25). This initial disclosure of asserted patents and accused products is based upon information reasonably and presently available to Autonomous, without the benefit of formal discovery or any meaningful disclosures from Tesla, Inc. (“Tesla”). Accordingly, Autonomous reserves the right (consistent with its obligations under the Federal Rules, the Local Rules, and the Court’s orders) to modify, amend, retract, and/or supplement these disclosures as additional evidence and information becomes available or as otherwise appropriate.

I. Asserted Patents

Autonomous is asserting the following patents in this case against the accused products identified below in Section II: U.S. Patent Nos. 10,452,974 (“the ’974 Patent”); 11,238,344 (“the ’344 Patent”); 11,055,583 (“the ’583 Patent”); and 10,102,449 (“the ’449 Patent”) 10,607,134 (“the ’134 Patent”); and 11,113,585 (“the ’585 Patent”) (collectively the “Asserted Patents”).

II. Accused Products, Methods and Systems

Autonomous alleges that the following products, methods and systems infringe the Asserted Patents:

- Tesla's vehicles, which currently include Models S, 3, X, and Y, having software Version 9.0 and beyond. Autonomous reserves the right to add new Tesla vehicles when they become available, e.g., Tesla's Cyber Truck, Roadster, Semi Truck, etc.
- Tesla's neural network and AI training computers, for example, the Dojo and predecessor supercomputers.

III. Damages Model

Pursuant to 35 U.S.C. § 284, plaintiff is seeking damages adequate to compensate it for infringement, but no less than a reasonable royalty, together with pre- and post-judgment interest, and costs and fees as fixed by the Court. Plaintiff may calculate such compensatory damages based on reasonably royalty damages.

In addition, plaintiff will seek the full measure of past damages consistent with 35 U.S.C. § 286 to the extent permitted by applicable law or any stipulation the parties are able to reach regarding United States Nexus. *See, e.g., Carnegie Mellon Univ. v. Marvell Tech. Grp., Ltd.*, 807 F.3d 1283, 1306-11 (Fed. Circ. 2015) (worldwide accruals based on United States nexus). Plaintiff may further seek enhanced and punitive damages for vexatious litigation and attorneys' fees under 35 U.S.C. § 285.

Plaintiff's investigation of the relevant facts pertaining to a reasonable royalty is ongoing, and Tesla has yet to produce financial documents. Computation of damages cannot be done

without the requisite discovery. Plaintiff reserves the right to amend this disclosure as discovery progresses.

IV. File Histories

Copies of the patents and file history of each asserted patent were produced today at AD_00000001 to AD_00009491.

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/s/ Emily S. DiBenedetto

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CERTIFICATE OF SERVICE

I, Emily S. DiBenedetto, hereby certify that on May 19, 2023, this document was served on the persons listed below in the manner indicated:

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